

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOEL AND MARY RICH,

Plaintiffs,

v.

Case No. 1:18-cv-02223

FOX NEWS NETWORK, LLC, MALIA
ZIMMERMAN, and ED BUTOWSKY

Defendants

NOTICE OF MOTION FOR PROTECTIVE ORDER

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Edward Butowsky, dated July 3, 2020, and the Declaration of Eden P. Quainton, dated July 3, 2020, together with the exhibits thereto, Defendant Edward Butowsky, by and through the undersigned counsel, will move this Court, before the Honorable George B. Daniels, United States District Judge, in Courtroom 11A at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, on such day and at such time designated by the Court, for (1) a protective order against a subpoena duces tecum served for Mr. Butowsky's phone records and (2) an award of attorney's fees.

Respectfully submitted,

/s/ Eden P. Quainton

Eden P. Quainton

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CERTIFICATE OF SERVICE

I certify that a copy of this document was filed electronically with the Court's ECF system on July 3, 2020 and thereby served electronically on all counsel of record. A copy of this document was also sent by email to counsel for AT&T Mobility, Ms. Nicole Byrd, who has agreed to accept service electronically, at NB9929@att.com.

/s/ Eden P. Quainton

Eden P. Quainton